

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

|                                |   |                     |
|--------------------------------|---|---------------------|
| IN RE: EQUIFAX, INC., CUSTOMER | ) | MDL Docket No. 2800 |
| DATA SECURITY BREACH           | ) | 1:17-md-2800-TWT    |
| LITIGATION                     | ) |                     |
|                                | ) |                     |

**DECLARATION OF JASON R. DOSS**

COMES NOW JASON R. DOSS, who states as follows:

1.

I am over eighteen years of age and am competent to give this Declaration,  
which is based upon my personal knowledge.

2.

Attached hereto as Exhibit 1 is a true and correct copy of a Letter of  
Recommendation from Frank B. Strickland of Strickland Brockington Lewis LLP.

3.

Attached hereto as Exhibit 2 is a true and correct copy of the Declaration of  
Alan R. Perry, Jr.

4.

Attached hereto as Exhibit 3 is a true and correct copy of a Letter of Recommendation from Robin Ringo of the Public Investors Arbitration Bar Association.

5.

Attached hereto as Exhibit 4 is a true and correct copy of the resume of Jason R. Doss.

FURTHER DECLARANT SAYETH NOT.

This 2nd day of February 2018.

/s/ Jason R. Doss  
Jason R. Doss

# **EXHIBIT 1**



STRICKLAND  
BROCKINGTON  
LEWIS LLP

Frank B. Strickland  
678.347.2211  
fbs@sblaw.net

Midtown Proscenium Suite 2200  
1170 Peachtree Street NE  
Atlanta, Georgia 30309-7200  
678.347.2200 tel | 678.347.2210 fax  
www.sblaw.net

January 31, 2018

The Honorable Thomas W. Thrash Jr.  
Chief United States District Judge  
Richard B. Russell Federal Building  
and United States Courthouse  
Chambers: 2188  
75 Ted Turner Drive SW  
Atlanta, GA 30303-3309

Re: *EQUIFAX, INC.*, CAFN: 17-md-02800-TWT

Dear Judge Thrash:

I write to recommend Jason Doss for a leadership role in the Equifax class case.

Jason represents the plaintiffs in *Kademi, LLC, et al. v. Equifax, Inc.*, 1:17-cv-03886 (N.D. Ga., Filed 10/4/2017) and *O'Dell Properties, LLC et al. v. Equifax, Inc.*, 1:17-cv-03618 (N.D. Ga., Filed 9/19/2017), generally known as the Small Business Plaintiffs cases in the Equifax case.

I have known Jason for more than ten years. I have worked with Jason extensively on class action cases, including *Ellison v. Georgia Natural Gas ("GNG")* in which we represented approximately 500,000 Georgia customers who alleged GNG overcharged them for natural gas. The case was the first of its kind and brought a claim against GNG for violating the Natural Gas Consumers Relief Act. Jason originated the case and we worked together on it for several years. The case received significant press coverage and was politically charged. The class case was appealed to the Georgia Supreme Court and we prevailed, reversing sixty years of case law involving the voluntary payment doctrine defense. This outcome resulted in a settlement in excess of \$11 million for 500,000 Georgia households.

Jason works well in groups and is a great collaborator. He is a smart, creative, ethical, and competent attorney who zealously represents his clients. He has devoted his career to protecting consumers and is a nationally recognized attorney who represents investors in complex fraud cases. He seems well suited for the Equifax matter because the case will involve complex issues related to creditworthiness and finance pertaining to consumers and small businesses. Jason's experience with complex financial instruments and issues would be an asset.

Doss Letter of recommendation  
January 31, 2018  
Page 2 of 2

During your tenure on the GSU College of Law Board of Visitors, you may have heard reports about the work of the Investor Advocacy Clinic at GSU, which provides free legal services to aggrieved investors. Under the supervision of an attorney, law students have opportunities to represent investors against Wall Street brokerage firms in FINRA arbitration. Jason and I were instrumental in the establishment of this clinic.

I would be glad to respond to any questions you may have.

Best regards.

Sincerely,

**STRICKLAND BROCKINGTON LEWIS LLP**

A handwritten signature in blue ink, appearing to read "Frank", with a stylized flourish at the end.

Frank B. Strickland

# **EXHIBIT 2**

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

|                                |   |                     |
|--------------------------------|---|---------------------|
| IN RE: EQUIFAX, INC., CUSTOMER | ) | MDL Docket No. 2800 |
| DATA SECURITY BREACH           | ) | 1:17-md-2800-TWT    |
| LITIGATION                     | ) |                     |
|                                | ) |                     |

**DECLARATION OF ALAN R. PERRY, JR.**

COMES NOW ALAN R. PERRY, JR., who states as follows:

1.

I am over eighteen years of age and am competent to give this Declaration, which is based upon my personal knowledge.

2.

My legal experience is set out in the abbreviated resume attached hereto as Exhibit "A." My plaintiffs' class action experience began with my partnership in the firm Chitwood & Harley in 1999 and has continued until the present. I worked almost exclusively on plaintiffs' securities class actions while a partner at Chitwood & Harley for 4 years, including a leadership role in the Oxford Health Plans litigation that resulted in a \$300 million settlement.

3.

I have known Jason Doss for approximately 13 years. I worked with Mr. Doss closely and extensively on several class action cases in which we represented the class, both at our firm Page Perry & Associates LLC and after he left that firm to form his own practice.

4.

The most notable and time-consuming of these class action cases was one nationwide class on behalf of some 420,000 Allianz Insurance policyholders, a case that Mr. Doss identified and was primarily responsible for originating.

5.

Even early in his Georgia legal career, Mr. Doss set himself apart by his hard work, his creative approaches to addressing legal problems, and by his ability to work well with other attorneys, including opposing counsel. Mr. Doss tempers his zealous representation of his clients with his collegial nature and innate ability to conduct adversarial proceedings in a fair and efficient fashion.

6.

Before, during, and especially after his time with my firm, Mr. Doss was known for his focus on consumer and investor issues. He took a leading role with the Public Investors Arbitration Bar Association (PIABA), an international organization dedicated to the protection of investors, with which he is still quite

active. Mr. Doss has a national reputation for representing investors in complex fraud cases.

7.

As a result of his lifelong focus, Mr. Doss would be particularly well suited for a leadership role in the above-captioned action because the case will necessarily involve issues related to creditworthiness and financial matters related to consumers and small businesses. If Mr. Doss is appointed to a leadership role in this case, his background with complex financial instruments as well as many other financial issues will redound to the benefit of this class.

8.

I have attempted to educate myself on Mr. Doss's unique focus in this case, that is, the claims brought by him on behalf of small businesses. It appears to me that the claims of these plaintiffs differ in significant respects from those of other consumers and that intra-class conflicts may suggest, if not compel, the need for separate lead counsel to make sure that such plaintiffs' interests are not abandoned or prejudiced as the case progresses.

9.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury that the forgoing is true and correct.

FURTHER DECLARANT SAYETH NOT.

This 1st day of February 2018.

/s/ Alan R. Perry, Jr. \_\_\_\_\_  
Alan R. Perry, Jr.

**Alan R. Perry, Jr.**

Office: 1493 LaVista Road NE  
Atlanta GA 30324  
(404) 567-4400  
[aperry@pageperry.com](mailto:aperry@pageperry.com)

**Professional Experience**

**Perry Law Firm d/b/a Page Perry**

12/13-present

Solo practice, civil litigation and FINRA arbitration

**Page Perry & Associates LLC**

9/03-11/13

Arbitration (FINRA and AAA), civil litigation

**Chitwood & Harley**

8/99-9/03

Plaintiffs' securities class action litigation

**Kilpatrick Stockton (now Townsend)**

1982-8/99

Civil litigation

**Rogers & Hardin**

1981-1982

Civil litigation

Law Clerk to the Honorable Edward A. Tamm, U. S. Court of Appeals for the District of Columbia Circuit, 1980-1981

**Education**

University of Michigan Law School, 1980, Magna cum laude

University of North Carolina-Chapel Hill, 1976, English Honors

**EXHIBIT "A"**

# **EXHIBIT 3**



**PUBLIC INVESTORS ARBITRATION BAR ASSOCIATION**

2415 A Wilcox Drive | Norman, OK 73069  
Toll Free (888) 621-7484 | Fax (405) 360-2063  
[www.piaba.org](http://www.piaba.org)

February 1, 2018

The Honorable Thomas W. Thrash, Jr.  
Chief United States District Judge  
Richard B. Russell Federal Building  
and United States Courthouse  
Chambers: 2188  
75 Ted Turner Drive SW  
Atlanta, GA 30303-3309

RE: Jason Doss Recommendation Letter  
Equifax Class

Dear Judge Thrash:

Thank you for the opportunity to recommend Jason Doss for leadership in the Equifax class case. As the Executive Director of Public Investors Arbitration Bar Association (PIABA), I've known Mr. Doss for more than 15 years. PIABA is an international bar association composed of attorneys who represent investors in securities arbitration proceedings. Since its formation in 1990, PIABA has promoted the interests of the public investor in all securities and commodities arbitration forums, while also advocating for public education regarding investment fraud and industry misconduct. Our members and their clients have a strong interest in rules promulgated by the Financial Industry Regulatory Authority ("FINRA") relating to investor protection.

Since joining the Association in 2001, Mr. Doss has served on and chaired numerous committees, including the Bylaws and Legislation Committees and Editor-in-Chief of the *PIABA Bar Journal*. Very well respected by his peers, Jason was elected by the PIABA Membership to the Board of Directors in 2009. Before retiring from the Board in October 2015, he served as Treasurer, Executive Vice-President/President Elect and President.

Gaining approval in May 2013, Jason and I worked together for 18 months to establish The PIABA Foundation (Foundation), a 501(c)(3) organization for the purpose of promoting investor education by providing the public with information about abuses in the financial services industry and the securities dispute resolution process. In his capacity as a Foundation Director, Mr. Doss served as Vice-President for two years, before being elected to serve as President, a position he continues to hold.

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*Officers and Directors*

President: Andrew Stoltmann, IL  
EVP/President-Elect: Christine Lazaro, NY  
Secretary: David Meyer, OH  
Treasurer: Michael Edmiston, CA

Hugh D. Berkson, OH  
Benjamin P. Edwards, NV  
Samuel B. Edwards, TX  
Adam Gana, NY

David Neuman, WA  
Marnie Lambert, OH  
Thomas D. Mauriello, CA  
Timothy J. O'Connor, NY

Darlene Pasieczny, OR  
Joseph C. Peiffer, LA  
Jeffrey R. Sonn, FL  
Robin S. Ringo, *Executive Director*

The Honorable Thomas W. Thrash, Jr.  
February 1, 2018  
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On behalf of the Foundation, in 2016, Mr. Doss was instrumental in the production of the video, "Trust Me", which addressed investor education and protection issues. During the filming of the video, I had the privilege to meet several of Mr. Doss' clients, and it was clear that they respected and appreciated his legal acumen and enjoyed his trust. In his continuing work with the Foundation, a series of short, Investor Education Videos are in development and scheduled for release later this year. These videos address questions and problems investors might encounter in the various investment arenas, with specific focus toward resolution.

The PIABA Foundation joined Alliance for Investor Education (AIE), an organization dedicated to facilitating greater understanding of investing, investments and the financial markets among current and prospective investors of all ages. AIE pursues initiatives for education and join with others to motivate Americans to obtain objective information and increase their knowledge and understanding of investing. Other AIE organizations include the American Association of Individual Investors (AAII), Certified Financial Planner Board of Standards (CFP Board), CFA Institute, Consumer Action, Financial Industry Regulation Authority (FINRA), Investor Protection Trust (IPT), Securities Investor Protection Corporation (SIPC), and National Endowment for Financial Education® (NEFE®).

Never one to sit on the sidelines, Jason was elected to the AIE Board in 2015. Immediately following his election to the AIE Board, Mr. Doss was elected Vice-President, a position he continues to hold. Since joining AIE, The PIABA Foundation has partnered with AIE and other member organizations to provide investor education programming in California and Maryland. Mr. Doss undertook significant responsibility in the preparation of these programs and continues to work with the AIE Board, as well as individual member organizations of AIE, to identify other investor education and protection avenues.

In conjunction with the State of Georgia and FINRA, Mr. Doss was instrumental in the founding of the Georgia State University Law School Investor Advocacy Clinic, a program allowing law students the opportunity to provide supervised representation of aggrieved investors who cannot otherwise obtain and/or afford an attorney to represent them in disputes with financial advisors and brokerage firms. Once established, Jason served as an Adjunct Professor, teaching and mentoring students while helping to run the Clinic.

Jason has written extensively on investor protection issues. On behalf of PIABA, FINRA, and various State and Federal Regulators, he has participated in numerous continuing legal education programs, addressing securities law and arbitration practice issues. With a focus on preventing investment and consumer abuse, Mr. Doss co-authored two books. In addition, he has co-authored articles for the *Georgia Bar Journal*, authored articles for *PIABA Bar Journal*, and released two national reports addressing investor issues in FINRA.

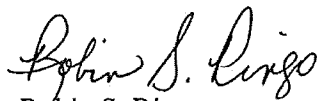
Having devoted his career to protecting consumers, Mr. Doss is a nationally recognized attorney for his work on behalf of retail investors in disputes involving bad investment advice and financial fraud. He is particularly well suited for the Equifax class case, in part because the case will involve complex issues related to creditworthiness and finance issues related to consumers and small businesses. Jason possesses extensive experience with complex financial instruments, and his experience with issues related to finance will be an asset.

The Honorable Thomas W. Thrash, Jr.  
February 1, 2018  
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As evidenced by his many undertakings and experiences, Mr. Doss possesses the facilitation and collaboration skills necessary to working well in large group situations. He is well qualified for leadership in the Equifax class case, and I highly recommend his appointment.

If I may provide additional information or assistance, do not hesitate to contact me.

Sincerely yours,

A handwritten signature in black ink, reading "Robin S. Ringo". The signature is written in a cursive, flowing style.

Robin S. Ringo  
PIABA, Executive Director

# **EXHIBIT 4**

Jason R. Doss  
36 Trammell Street, Suite 101  
Marietta, Georgia 30064  
(770) 578-1314 office  
(770) 578-1302 fax  
jasondoss@dossfirm.com  
www.dossfirm.com

**PROFESSIONAL EXPERIENCE:**

**Attorney/Owner, The Doss Firm, LLC** (January 2009- present)  
Marietta, Georgia

The Doss Firm, LLC is a successful law firm primarily devoted to representing aggrieved consumers across the United States against financial services companies for mismanaging investments and engaging in financial fraud. The attorneys of the firm have represented almost 1000 clients and have a combined 45 years of experience representing individual retail investors, institutional investors, and businesses in financial fraud litigation, securities arbitrations, and collective and class actions. Many of the firm's clients are vulnerable adults who are victims of complex frauds involving financial exploitation and are often targeted by criminals in identity theft schemes. In one of our high-profile cases, we successfully represented dozens of investors against New Birth Missionary Baptist Church and the late Bishop Eddie Long for their alleged role in a Ponzi scheme perpetrated by Ephren Taylor, who is now serving a lengthy federal prison sentence. The case was featured on ABC *NightLine*, the ABC show *The Lookout* and the BET show, *Criminals At Work*. Since its inception, the law firm has recovered tens of millions of dollars in losses for consumers.

The law firm also represents consumers in class actions. For example, Jason Doss served as co-lead counsel and obtained settlements totaling \$18 million on behalf of over 750,000 Georgia households in two class cases against Georgia Natural Gas (GNG) and SCANA Energy, the two largest natural gas marketers in Georgia accused of overcharging their customers. Both cases presented multiple legal issues of first impression. The GNG case was appealed to the Georgia Supreme Court and plaintiffs prevailed, reversing sixty (60) years of case law involving the applicability of the voluntary payment doctrine defense.

Jason Doss was also primarily responsible for originating a nationwide consumer class of approximately 420,000 policyholders in equity-indexed annuities against Allianz Life Insurance Company, *Linda L. Mooney et. al. v. Allianz Life Insurance Company of North America*, 06-cv-545, United States District Court of Minnesota. His former law firm Page Perry, LLC was co-lead counsel with two other firms.

Jason Doss has co-authored two books, Doss, J. and Frankowski, R., *A Practitioner's Guide To Securities Arbitration* (2013), American Bar Association (225 pages) and Armstrong, F. and Doss, J., *The Retirement Challenge: Will You Sink or Swim?* (Jan. 2009), FT Press, Prentice Hall Publishing (266 pages). *A Practitioner's Guide To Securities Arbitration* is used by law schools and practitioners across the country as a resource to help navigate the FINRA arbitration process. *The Retirement Challenge: Will You Sink or Swim?* is in bookstores across the country and is

designed to help consumers avoid the pitfalls of investing and avoid becoming a victim of financial fraud.

Jason Doss was the first and only attorney in the country to file class complaints against Equifax on behalf of small businesses resulting from the recent data breach. The filing of the cases made national news and resulted in over 150 news stories by media outlets such as CNN Money, CNBC, The National Law Journal as well as local news outlets across the country.

Over the last ten years, Jason Doss has been quoted many times by major publications and news organizations about topics involving financial fraud including USA Today, The Wall Street Journal, The New York Times, Reuters, The Associated Press, Bloomberg, AARP Magazine, The Street, and The Atlanta Journal Constitution.

#### **Alliance For Investor Education (2014-present)**

Mr. Doss has been an officer of the Alliance for Investor Education (AIE) since January 2016. AIE is a national non-profit organization dedicated to facilitating greater understanding of investing, investments, and the financial markets among current and prospective investors of all ages. Members of AIE include large non-profit foundations such as the FINRA Foundation, Investment Company Institute, Investor Protection Trust, CFA Institute, CFP Board as well as advisory board members such as the Federal Trade Commission, Securities and Exchange Commission, and NASAA (state securities regulators). The prevention of identity theft is a goal shared by all members of AIE and the organization has spearheaded educational campaigns to help prevent it.

#### **Georgia Watch (2017-present)**

Mr. Doss serves on the Board of Directors for the non-profit Georgia Watch. Founded in 2002, Georgia Watch is the State's leading consumer advocacy organization. As a 501(c)(3) non-profit, non-partisan organization, we work to ensure that Georgians are educated and protected on matters that impact their quality of life. We focus on ensuring access to quality affordable healthcare, fair utility rates, renewable energy options, safeguarding personal finances, and access to courts. Through advocacy, outreach and education, we work tirelessly to make Georgia a model for consumer protection. The prevention of identity theft is a priority for the organization.

#### **Adjunct Professor at Georgia State University College of Law (Spring 2014-Spring 2016)**

Mr. Doss helped to create the Georgia State College of Law Investor Advocacy Clinic, a clinic where supervised law students provide free legal assistance to investor clients to help recover their losses that may be too small to be handled by a private attorney. For six (6) semesters, Mr. Doss served as adjunct professor with the College of Law teaching students at the clinic. One of the readings for the course is a book authored by Mr. Doss and published by the American Bar Association entitled *A Practitioner's Guide To Securities Arbitration*. Notably, the book is also used at other law schools including but not limited to St. John's University and the University of Miami.

**Founding Director and President/CEO of The PIABA Foundation** (February 2011-present)

The PIABA Foundation is a 501(c)(3) charitable organization devoted to promoting investor education to prevent financial exploitation and investment abuse. On behalf of the PIABA Foundation, Mr. Doss is actively involved with the Alliance For Investor Education, an organization that coordinates with the Securities Exchange Commission and state securities regulators and includes some of the largest foundations across the country devoted to investor education, including the FINRA Foundation and the Investor Protection Trust.

**Public Investor Arbitration Bar Association (PIABA)** (2001-present) International bar association devoted to protecting the rights of the public investor in securities disputes.

- President (October 2013-October 2014)
- President-Elect (October 2012-October 2013)
- Director (October 2009-October 2015);
- Treasurer (October 2010- October 2012);
- Chair of Legislative Committee (October 2011-October 2013)
  - Coordinated volunteers to participate in the legislative process.
  - The primary agenda over the last two years was to monitor and impact state and federal laws designed to prevent elder abuse, specifically the financial exploitation of the elderly.
- Chair of North American Securities Administrators Association (NASAA) Committee (October 2012-2015)
  - Coordinated with state securities regulators to implement agenda designed to protect the investing public.
- Co-Chair Dodd-Frank Wall Street Task Force (October 2010-2013)
  - Participated in meetings with the Securities Exchange Commission (SEC) staff, Department of Labor, federal and state legislators on issues related to the protection of the investing public.
- Editor In Chief of PIABA Bar Journal (2005-2007);
- Editorial Board of PIABA Bar Journal (2004-2011); and
- Member (2001-present).

**Page Perry, LLC** (June 2004- January 2009)  
Atlanta, Georgia

- Litigation Partner (2007-2009) and Associate (2004-2007);
- Represented investors in securities arbitrations and class action litigation;
- Originated and served a principal role on behalf of the law firm in a nationwide consumer class action against Allianz Life Insurance Company of North America for the alleged deceptive marketing and sale of equity index bonus annuities.
- Successfully litigated and arbitrated many cases brought under federal and state securities laws.

**Coppins & Monroe, P.A.** (October 2002- June 2004)  
Tallahassee, Florida

- Sole attorney in the firm who originated and represented investors in securities arbitrations; associate for partners representing businesses in litigation; and
- Litigated many cases on behalf of investors under the Florida Securities and Investor Protection Act.

**NOTABLE CLASS CASES:**

*Fowler, et al. v. SCANA Energy Marketing, Inc., U.S.D.C. Northern District of Georgia*, Case No. 1:12-cv-02356-RLV (Co-lead counsel on a putative consumer class of approximately 250,000 class members alleging that the second largest natural gas provider in Georgia, SCANA Energy, overcharged them for natural gas services; Case settled for \$6.5 million.)

*Ellison et. al. v. Southstar Energy Services, LLC d/b/a Georgia Natural Gas*, Superior Court of Fulton County, Georgia, Case No. 2008-CV-147195 (Co-lead counsel of a settlement class of approximately 460,000 consumers alleging that the largest natural gas provider in Georgia, Georgia Natural Gas, overcharged them for natural gas services; Case settled for \$11.5 million.)

*Linda L. Mooney et. al. v. Allianz Life Insurance Company of North America*, 06-cv-545, United States District Court of Minnesota (Law firm was co-lead counsel on national consumer class action representing 420,000 policyholders of equity indexed annuities.)

**NOTABLE CLASS DECISIONS:**

*Southstar Energy Services, LLC d/b/a Georgia Natural Gas v. Ellison et. al.*, 286 Ga. 709, 691 S.E.2d 203 (2010) (affirmed unanimously the Court of Appeals decision)

*Ellison et. al. v. Southstar Energy Services, LLC d/b/a Georgia Natural Gas*, 298 Ga. App. 170, 679 S.E.2d 750 (2009) (reversed in a 5-4 decision trial court's dismissal of class action on behalf of 460,000 consumers based on the voluntary payment doctrine, changing over 60 years of precedents.)

**NOTABLE LOCAL ARTICLES:**

Doss, J. and Port R., *Holmes v. Grubman - The Georgia Supreme Court Balances Financial Advisor Common Law Liability and Investor Protection: Brokers Got To Know When To Hold 'Em and Know When To Fold 'Em*, Georgia Bar Journal (2011).

Doss, J. and Port R., *Wall Street wants to keep consumers in the dark: Don't know the difference between financial and investment advisors? Financial firms want to keep it that way*. Fulton Daily Report, Oct. 15, 2010.

Doss, J. and Parker, J., *Georgia Securities Act — Let the Buyer Beware!*, Georgia Bar Journal (2005).

**EDUCATION:**

Florida State University- Juris Doctor (1999-2002)

- Mock Trial Best Advocate Award
- Mock Trial Coaches Award
- Former Alumni Board of Directors Member

University of Florida- Bachelor of Arts (1993-1997)

- Major: Environmental Science

**SOCIAL ORGANIZATIONS:**

Member of the Cobb Chamber of Commerce

Member of the Marietta Kiwanis Club

**PROFESSIONAL LICENSES:**

Licensed to practice law in Georgia and Florida